

# Panasonic

## CORPORATE POLICY AND PROCEDURE GUIDE

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<b>SUBJECT:</b> Integrated Accessibility Standards	<b>NUMBER:</b> 04-03-03
	<b>DATE:</b> October 2014
<b>ISSUED BY:</b> Corporate Finance	<b>SUPERSEDES:</b> New

### APPLICATION

This policy applies to all employees and anyone acting on the instructions of or on behalf of **Panasonic Canada Inc.** (PCI), including independent third party contractors. This policy will be implemented in accordance with the time frames established in the ***Integrated Accessibility Standards, Ontario Regulation 191/11***

### INTENT

**PCI is committed to meeting the accessibility needs of persons with disabilities in a timely manner, and removing barriers to accessibility.** This policy is to describe how PCI has or will achieve accessibility for people with disabilities in order to meet the requirements of ***Integrated Accessibility Standards, Ontario Regulation 191/11*** made under the ***Accessibility for Ontarians with Disabilities Act, 2005.***

### DEFINITIONS

“accessible formats” may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

“communication supports” may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

### ACCESSIBILITY PLAN

PCI will develop, maintain and document an Accessibility Plan outlining the company’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company’s website. Upon request, PCI will provide a copy of the Accessibility Plan in an accessible format.

### TRAINING

PCI will provide training on the requirements of the accessibility standards referred to in the Ontario Regulation 191/11 and continue to provide training on the Human Rights Code as it pertains to persons with disabilities to:

- all its employees and volunteers;
- all persons who participate in developing PCI’s policies; and
- all other persons who provide goods, services or facilities on behalf of PCI.

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The training will be appropriate to the duties of the employees, volunteers and other persons. Training will be also provided when any changes are made to PCI's accessibility policies. PCI will keep a record of the training it provides.

**THE INFORMATION AND COMMUNICATIONS STANDARD**

**Accessible Websites and Web Content**

PCI will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 – Level A except where this is impracticable.

**Feedback**

PCI will ensure that its processes for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of, accessible formats and communications supports, upon request.

**Accessible Formats and Communication Support**

Upon request, PCI will provide, or arrange for the provision of, accessible formats and communication supports for persons with disabilities in a timely manner, taking into account the person's accessibility needs due to disability. PCI will consult with the person making the request in determining the suitability of an accessible format or communication support. PCI will also notify the public about the availability of accessible formats and communication supports.

**THE EMPLOYMENT STANDARD**

**Recruitment, general, assessment or selection process and notice to successful applicants**

PCI will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. During a recruitment process, PCI shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability. When making offers of employment, PCI will notify the successful applicant of its policies for accommodating employees with disabilities.

**Informing employees of supports**

PCI shall inform employees of our policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. All new employees will, as soon as practicable after they begin their employment. Receive the same information. PCI shall provide updated

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information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

#### **Accessible formats and communication supports for employees**

Where an employee with a disability so requests it, PCI shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,

- (a) information that is needed in order to perform the employee's job; and
- (b) information that is generally available to employees in the workplace.

PCI shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

#### **Workplace emergency response information**

PCI shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and we are made aware of the need for accommodation due to the employee's disability. If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, PCI shall provide the workplace emergency response information to the person designated by PCI to provide assistance to the employee. PCI shall provide the information required as soon as practicable after PCI becomes aware of the need for accommodation due to the employee's disability.

PCI shall review the individualized workplace emergency response information,

- (a) when the employee moves to a different location in the organization;
- (b) when the employee's overall accommodations needs or plans are reviewed; and
- (c) when PCI reviews its general emergency response policies.

#### **Documented individual accommodation plans**

PCI shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process for the development of documented individual accommodation plans shall include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which PCI can request an evaluation by an outside medical or other expert, at our expense, to assist us in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from the workplace, in the development of the accommodation plan.

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5. The steps taken to protect the privacy of the employee’s personal information.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability.

Individual accommodation plans shall,

- (a) if requested, include any information regarding accessible formats and communications supports provided, as described previously in this policy;
- (b) if required, include individualized workplace emergency response information, as described previously in this policy, and
- (c) identify any other accommodation that is to be provided.

**Return to work process**

PCI shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and document the process. The return to work process shall outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and use documented individual accommodation plans, as described in this Policy, as part of the process. The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.

**Performance management**

Performance management (activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success in respect of its employees) shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.

**Career development and advancement**

PCI shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.

**Redeployment**

If PCI reassigns employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization , PCI shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

**NOTICE OF AVAILABILITY AND FORMAT OF DOCUMENTS**

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**PCI** shall notify the public and employees that a written description of this policy is available upon request and in a format that takes into account the person's disability. Notification will be given by posting the information in a conspicuous place owned and operated by **PCI**, on **PCI's** website and/or any other reasonable method.

Approved by: Brian McMullan	Date:
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